

STATE OF ALABAMA
BALDWIN COUNTY

GRAHAM OIL COMPANY, INC.,
ATMORE, ALABAMA, A CORPORATION,
PLAINTIFF,

VS.

CIRCUIT COURT

C.M. WARD AND JAMES T. ALLISON, A CO-
PARTNERSHIP, DOING BUSINESS AS WARD'S
SERVICE STATION,
DEFENDANTS.

The judgment, entered and docketed herein on the 8th day of May, 1950, in favor of Graham Oil Company, Inc., the plaintiff, and against C.M. Ward and James T. Allison, the defendants, for the sum of Two Thousand Eight Hundred Ninety and 91/100 (\$2,890.91) Dollars and for the further sum of Sixteen and 65/100 (\$16.65) Dollars, the costs in said suit, and the Certificate of Judgment being recorded in the Office of the Judge of Probate of Baldwin County in Judgment record number four (4) at page 406, is hereby acknowledged to be paid and satisfied in full and the clerk is hereby authorized to satisfy said judgment of record.


Robert D. Johnston
Attorney for Plaintiff

1470

FILED

JUN 14 1950

ALICE A. DICK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

Graham Oil Company, Inc.,

Atmore, Alabama, a corporation,
Plaintiff,

VS.

C.M. Ward and James T. Allison,

a Co-Partnership doing business

as Ward's Service Station,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY.

Comes the plaintiff in the above styled cause and
moves the Court that judgment by default be taken against
the defendant.

JOHNSTON & JERNIGAN
ATTORNEYS FOR PLAINTIFF

BY:

Robert D. Johnston

RECORDED

STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

GRAHAM OIL COMPANY, INC.,
ATMORE, ALABAMA, A CORPORATION,
PLAINTIFF,

VS.

C.M. WARD AND JAMES T. ALLISON,
A CO-PARTNERSHIP DOING BUSINESS
AS WARD'S SERVICE STATION,
DEFENDANTS.

MOTION FOR DEFAULT JUDGMENT

JOHNSTON & JERNIGAN
BREWTON, ALABAMA
ATTORNEYS FOR PLAINTIFF

*Filed 4-4-50
A. J. French
clerk.*

The State of Alabama

County

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

You are hereby commanded to summon C. M. Ward and James T. Allison, Fairhope,Alabamato appear at the next term of the Circuit Court, to be held for said County, at the place of holding the same, then and there to answer the complaint of Graham Oil Company, Inc.

Witness my hand, this

1st

day of

March1920

Circuit Clerk.

COMPLAINT

Graham Oil Company, Inc.,Minore, Alabama, a Corporation

Plaintiff

vs.

C. M. Ward and James T. Allison,A Co-Partnership doing business asWard's Service Station,

Defendant

The Plaintiff claims of the Defendants Two Thousand Eight Hundred Thirty Fourand Twenty Three One Hundredths (\$2,834.23)

Dollars,

due from them by account on the 2nd day of January1920

And the Plaintiff further claim of the Defendant

Dollars,

due for money loaned by the Plaintiff to the Defendant on the day of

19

And the Plaintiff further claim of the Defendant

Dollars,

due on account stated between Plaintiff and Defendant on the day of

19

And the Plaintiff further claim of the Defendant

Dollars,

due for merchandise, goods and chattels sold by the Plaintiff to Defendant on the day of

19

And the Plaintiff further claim of the Defendant

Dollars,

due for money paid by Plaintiff for Defendant at request, on the day of

19

And the Plaintiff further claim of the Defendant

Dollars,

due for work and labor done by the Plaintiff for the Defendant at request on the

day of 19

Which sum of money, with the interest thereon, is now due.

Robert D. Johnston Plaintiff's Attorneys
H. L. Gurnigan

No. 1470 RECORDED

The State of Alabama

BALDWIN

County

CIRCUIT COURT

GRAHAM OIL COMPANY, INC.,

ATMORE, ALABAMA,

A CORPORATION,

Plaintiff...

vs.

G. M. WARD & JAMES T. ALLISON,

A CO-PARTNERSHIP

DOING BUSINESS AS WARD'S

SERVICE STATION

Defendant.

Summons and Complaint on Account

Filed this 1st day of March 1950

R. O. J. [Signature] Circuit Clerk

H. K. [Signature] Plaintiff's Attorneys

Record Book No. Page

Received in office this 1 day of

March 1950
Taylor Wilkins
Sheriff.

Executed this 3 day of

March 1950, by

leaving a copy of the within Summons and Com-
plaint with C. M. Ward

Defendant...

Taylor Wilkins
Sheriff.

H. K. [Signature]
Deputy Sheriff.

This suit is brought on an itemized account duly verified by affidavit.

Robert O. Johnson & H. K. [Signature]
Plaintiff's Attorneys

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

February 17, 1950

TO: C.M. Ward and James T. Allison,
A Co-partnership,
d/b/a

Ward's Service Station

Fairhope, Alabama

DATE	DELIVERIES	AMOUNT
1947		
3-28-47	59162	\$ 518.18
29	59166	17.95
31	Rent	6.74
4-17-47	Error-62154	20.60
31	Rent	25.00
4-4-47	Paid	25.00
24	Cr. State Inv.	22.00
24	Dif. Price to State	4.17
24	Com. Gas. to State	1.20
24	Paid	19.60
24	"	100.00
5-9-47		239.20
31	Rent	25.00
5-1-47	Paid	1.00
5	Rent Chgd. in Error	6.74
10	Paid	239.20
16	"	25.00
4	"	2.57
23	Com. Gas. to State	3.21
29	" " " "	2.52
6-20-47	78112	78.12
20	78107	1.00
30	Rent	25.00
6-6-47	Paid	25.00
7	Com. Gas to State	.37
27	Paid	78.12
7-31-47	Rent	25.00
7-11-47	Paid	25.00

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 2

<u>DATE</u>	<u>DELIVERIES</u>	<u>AMOUNT</u>
8-30-47	Rent	\$ 25.00
8-14-47	Gas to T.A.Graham	\$ 3.84
30	Paid	25.00
9-30-47	Rent	25.00
9-15-47	Paid	25.00
10-11-47	85934	201.15
31	Rent	25.00
10-17-47	Paid	25.00
29	"	251.55
11-1-47	67080	251.55
7	Dif. 67503	2.00
29	Rent	25.00
11-7-47	Paid	25.00
15	Dif. 67311	4.00
24	Paid	48.65
12-20-47	74577	233.10
27	74581	218.10
31	Rent	25.00
12-13-47	Paid	25.00
27	"	233.10
<u>1948</u>		
1-2-48	70975	243.00
9	73020	198.05
16	73037	326.00
23	73041	269.00
31	83084	273.00
31	Rent	25.00
1-2-48	Paid	217.80
3	"	25.00
9	"	243.00
17	"	198.05

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 33

<u>DATE</u>	<u>DELIVERIES</u>	<u>AMOUNT</u>
1-24-48	Paid	\$ 326.00
31	"	\$ 269.00
2-9-48	74979	191.90
13	74994	202.43
20	89305	318.58
27	92415	197.00
28	Rent	25.00
2-9-48	Paid	273.00
13	"	139.43
16	" McKean Paint & Hdw.Co.	51.47
19	"	25.00
19	"	202.43
27	"	318.58
3-2-48	92422	19.68
5	94409	253.98
6	91609	25.62
12	94419	209.06
1 19	91653	252.69
25	94443	246.00
31	Rent	25.00
3-8-48	Paid	197.00
12	"	253.98
19	"	209.06
25	"	312.69
4-2-48	92809	204.60
9	92816	280.08
16	92835	267.05
24	95315	320.06
30	Rent	25.00
4-2-48	Paid	246.00
2	"	25.00
9	"	204.60
16	"	280.08
24	"	267.05
30	"	320.06

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 4

DATE	DELIVERIES	AMOUNT
5-1-48	95333	\$ 306.40
7	229-18	186.12
14	93763	325.10
21	93774	267.86
28	937835	280.50
31	Rent	25.00
5-7-48	Paid	306.40
14	"	186.12
21	"	325.10
22	Gas & Oil to State	101.47
22	Com. " " "	6.13
28	Paid	267.86
28	Com. & Dif. Price to State	2.24
6-4-48	93794	289.82
11	1528-18	285.26
18	1542-28	255.06
25	2340-11	284.84
30	2121-45	32.10
30	Rent	25.00
6-4-48	Paid	280.50
4	Com. Gas to State	.50
11	Paid	289.82
11	Com. Gas to State	.61
16	Paid	25.00
16	"	285.26
18	Com. Gas to State	.43
25	Paid	255.06
25	"	.45
7-2-48	2340-20	284.84
6	2340-26	194.04
10	1859-19	157.37
15	Tires & Tubes	82.68
16	2340-43	198.42
24	2411-8	248.64
29	2339-25	263.20
31	Rent	25.00

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 5

DATE	DELIVERIES	AMOUNT
7-2-48	Paid	\$ 284.84
6	"	316.94
10	"	194.04
16	"	157.37
16	"Com. Gas to State	.83
24	"	198.42
29	"	248.64
31	Com. Gas. to State	.66
8-3-48		267.30
11	477-15	251.43
19	2411-44	345.15
27	477-44	284.84
31	Rent	25.00
8-3-48	Paid	263.20
11	"	267.30
11	"	50.00
19	"	251.43
20	Com. Gas to State	.24
28	Paid	343.68
28	Com. Gas. to State	1.10
9-3-48	449-20	314.80
4	933-3 Tires	67.91
6	454-21	48.04
11	452-31	244.82
17	448-28	231.32
24	600-8	199.99
30	Rent	25.00
9-3-48	Paid	284.84
9	"	314.80
16	"	292.86
25	"	231.32
10-1-48	051	265.34
8	065	216.32
15	076	239.90
23	088	318.45
29	097	274.70
30	Rent	25.00

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 6

<u>DATE</u>	<u>DELIVERIES</u>	<u>AMOUNT</u>
10-1-48	Paid	\$ 209.99
8	"	265.34
15	"	216.32
15	Com. Gas to State	.50
22	Paid	239.90
22	"	25.00
29	Com. Gas to State	.71
29	Paid	318.45
11-5-48	5460	287.56
5	Tires & Tubes	70.30
13	1862	235.56
19	5482	221.42
26	1989	216.32
30	Rent	25.00
11-5-48	Paid	274.70
5	"Com. Gas. To State	.32
13	"	287.56
19	" Com. Gas To State	.69
19	"	235.56
26	"	221.42
12-3-48	5493	271.94
10	4058	232.47
17	4067	203.91
23	4077	159.30
31	Rent	25.00
31	4087	230.54
12-3-48	Paid	215.52
10	"	271.94
10	Com. Gas to State	.71
10	Axle for Truck	11.00
17	Paid	232.47
17	Com. Gas to State	.44
23	Paid	203.91
31	"	159.30
31	Com. Gas to State	.50

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

PAGE 7

WARD SERVICE STATION

DATE	DELIVERIES	AMOUNT
<u>1949</u>		
		\$ 251.96
1-7-49	4099	187.34
14	63310	193.97
21	63321	92.52
28	63333	25.00
31	Rent	
		250.54
1-7-49	Paid	57.89
10	Repair to Roof	251.96
13	Paid	.36
14	Com. Gas to State	187.34
21	Paid	.35
21	Com. Gas to State	193.97
28	Paid	
		221.40
2-4-49	63348	193.84
11	2672	145.32
18	2684	86.00
25	70952	25.00
28	Rent	4.00
26	Insurance	
		92.52
2-4-49	Paid	221.40
11	Paid	196.84
18	"	25.00
18	"	145.32
25	"	
		284.00
3-7-49	70979	33.66
11	70981	149.62
18	72302	4.00
1	Insurance-A.C. Bishop	8.00
28	" Bishop & C.M. Ward	272.63
30	75416	25.00
31	Rent	
		86.00
3-7-49	Paid	284.00
18	"	149.62
30	"	
		234.50
4-8-49	75426	26.22
11	82281	330.82
21	71551	

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

PAGE 8

WARD SERVICE STATION

<u>DATE</u>	<u>DELIVERIES</u>	<u>AMOUNT</u>
4-30-49	Rent	\$ 25.00
30	Insurance-Bishop	4.00
30	" -Ward	4.00
4-8-49	Paid	316.29
21	"	260.72
5-5-49	71576	361.26
17	21676	389.46
28	Insurance-Bishop	4.00
28	"-Ward	4.00
30	71824	352.56
30	Rent	25.00
5-5-49	Paid	316.82
17	"	360.86
30	"	375.46
6-11-49	66656	305.94
11	66657	25.68
22	68735	371.70
29	Rent	25.00
30	Insurance-Bishop	4.00
30	" - Ward	4.00
6-13-49	Paid	352.56
22	"	331.62
7-5-49	16428	350.36
16	70519	342.24
30	Rent	25.00
30	Insurance -Bishop	4.00
30	" - Ward	4.00
7-5-49	Paid	371.70
15	"	350.36

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATIONPAGE 9

<u>DATE</u>	<u>DELIVERIES</u>	<u>AMOUNT</u>
8-1-49	67768	\$ 355.11
9	63430	298.84
16	63448	225.20
23	64565	227.26
30	64583	226.11
31	Rent	25.00
31	Insurance - Bishop	4.00
31	" - Ward	4.00
8-16-49	Paid	298.84
23	"	225.20
30	"	227.26
9-13-49	71460	286.46
22	Check Returned	226.11
23	Error on Inv.	4.00
30	Rent	25.00
30	Insurance - Bishop	4.00
30	Insurance - Ward	4.00
30	Bad Check	104.00
9-13-49	Paid	226.11
22	Check Returned	226.11
10-4-49	65809	309.36
11	Bad Check	286.46
21	" "	214.54
25	65845	382.06
31	Rent	25.00
31	Insurance - Bishop	4.00
31	" - Ward	4.00
10-1-49	Paid	104.00
4	"	286.46
11	Bad Check	286.46
21	" "	214.54
25	Paid	313.36
11-1-49	Bad Check	313.36
8	Dif. 65214	.20
8	65215	221.86
22	Bad Check	313.36
22	65241	367.84

GRAHAM OIL COMPANY, INC.

INDEPENDENT DISTRIBUTORS OF PETROLEUM PRODUCTS

Telephone 72-J

ATMORE, ALABAMA

WARD SERVICE STATION

PAGE 10

DATE	DELIVERIES	AMOUNT
11-30-49	Rent	\$ 25.00
30	Insurance-Bishop	4.00
30	" - Ward	4.00
11-1-49	Paid Bad Check	313.36
22	" " "	313.36
26	Paid	221.86
12-6-49	63545	382.44
6	Bad Check	221.86
14	" "	367.84
20	75427	292.40
31	Rent	25.00
12-6-49	Paid	367.84
6	Paid Bad Check	221.86
14	" " "	367.84
<u>1950</u>		
1-31-50	Rent	25.00
		\$ 27,487.02
		\$ 24,652.79
	Less Credits	24,652.79
		\$ 2,834.23

STATE OF ALABAMA
 ESCAMBIA COUNTY:

C.D. Kelley, Manager of Graham Oil Company, Inc., being duly sworn, deposes and says that the foregoing statement of account due by Ward Service Station to Graham Oil Company, Inc., for the sum of \$2,834.23, is true and correct, due, and unpaid and that all lawful offsets, payments and credits have been allowed.

Sworn to before me this 23 day of February, 1950.

C.D. Kelley

Notary Public

ROBERT D. JOHNSTON

ATTORNEY-AT-LAW

FORD BUILDING PHONE 715

BREWTON, ALABAMA

April 3, 1950

Mrs. Alice J. Duck
Circuit Clerk,
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Find enclosed a Motion for default judgment to be
taken in Case #1470, Graham Oil Co. Inc. vs. C.M. Ward,
et al.

We appreciate your having the Certificate of Judgment recorded.

Sincerely,

JOHNSTON & JERNIGAN
ATTORNEYS AT LAW

BY:



RDJ/bjb

ROBERT D. JOHNSTON

ATTORNEY-AT-LAW

FORD BUILDING PHONE 715

BREWTON, ALABAMA

February 27, 1950

Miss Alice J. Duck
Circuit Clerk, Baldwin County
Bay Minette, Alabama

Dear Miss Duck:

Find enclosed two copies of a Summons and Complaint on Account and an itemized account, duly verified by affidavit, which we wish to file for our client, Graham Oil Company against C. M. Ward and James T. Allison, Fairhope, Alabama.

If it is in keeping with your policy, we would greatly appreciate your keeping us informed as to dates of service, answers, etc., to this suit. If it is not your policy to do this, please so inform us so that we can make other arrangements. Also, please bill us for any mailing cost occasioned by the above mentioned correspondence.

Sincerely,

JOHNSTON & JERNIGAN
ATTORNEYS AT LAW

BY:

Robert D. Johnston

RDJ/bjb
Enclosure 3

1470

Graham Oil Co

vs.

C. M. Ward &
James I. Allison

Suit on accounts

Filed 3-1-50

Johnson & Ferguson
Brewton, Ala.

1470